

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

Chieftain Royalty Company, on behalf      )  
of itself and all others similarly situated,      )  
                                                      )  
*Plaintiff*,                                    )  
                                                      )  
v.                                                    )      Case No. CIV-12-1319-D  
                                                      )  
Laredo Petroleum, Inc.,                        )  
                                                      )  
*Defendant*.                                    )  
                                                      )  
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**CLASS REPRESENTATIVE'S MOTION FOR LEAVE  
TO FILE AFFIDAVIT OF BARBARA LEY UNDER SEAL**

Class Representative hereby requests leave of Court to file under seal Barbara Ley's Affidavit in support of Class Representative's Motion for Order Approving Final Distribution (Dkt. No. 60), as well as all exhibits attached thereto, and would respectfully show the Court as follows:

1.        Class Representative seeks to file under seal Barbara Ley's Affidavit and all exhibits attached thereto because such documents contain confidential royalty owner information such as tax identification numbers and the like.
2.        WHEREFORE, Class Representative prays this Court issue an Order granting it leave to file Barbara Ley's Affidavit in support of its Motion for Order Approving Final Distribution (Dkt. No. 60) and all exhibits attached thereto under seal, together with all other relief this Court deems just and proper.

Dated: July 24, 2015

Respectfully submitted,

/s/ Bradley E. Beckworth

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**CLASS COUNSEL AND  
ATTORNEYS FOR CLASS  
REPRESENTATIVE**

**CERTIFICATE OF SERVICE**

I hereby certify that I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send email notification of such filing to all registered parties.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: July 24, 2015.

/s/ Bradley E. Beckworth

Bradley E. Beckworth